UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

Robert J. Feinstein, Esq. Bradford J. Sandler, Esq. Cia Mackle, Esq. PACHULSKI STANG ZIEHL & JONES LLP 1700 Broadway, 36th Floor

New York, NY 10019 Telephone: (212) 561-7700 Facsimile: (212) 561-7777 rfeinstein@pszjlaw.com bsandler@pszjlaw.com cmackle@pszjlaw.com

Counsel to the GUC Trustee

In re:

Chapter 11

CTI Liquidation Co., Inc.,

Case No. 23-14853 (JKS)

Post-Effective Date Debtor.

CERTIFICATION OF NO OBJECTION REGARDING GUC TRUSTEE'S THIRD OMNIBUS OBJECTION TO CLAIMS SEEKING TO DISALLOW AND EXPUNGE CERTAIN SATISFIED CLAIMS

- 1. On June 2, 2025, META Advisors LLC, in its capacity as GUC Trustee (the "GUC Trustee") of the Cyxtera GUC Trust established in the chapter 11 cases of the above-captioned debtors (collectively, the "Debtors"), filed the GUC Trustee's Third Omnibus Objection to Claims Seeking to Disallow and Expunge Certain Satisfied Claims [Docket No. 1043] (the "Objection").
- 2. The GUC Trustee served its Objection on June 2, 2025, upon the parties listed in the *Certificate of Service* [Docket No. 1046].
- 3. Pursuant to the Objection, the deadline for parties to file objections and responses to the Objection was on July 7, 2025 (the "Objection Deadline"). No objections or responses to

the Objection were filed on the docket on or before the Objection Deadline. The GUC Trustee has not received any informal responses to the Objection on or before the Objection Deadline.

4. The GUC Trustee respectfully requests that the Court enter the attached proposed order at the earliest convenience of the Court.

Dated: July 11, 2025 KELLEY DRYE & WARREN LLP

/s/ James S. Carr

James S. Carr, Esq.
Dana P. Kane, Esq.
One Jefferson Road, Second Floor
Parsippany, NJ 07054
Telephone: (973) 503-5900
Facsimile: (973) 503-5950
jcarr@kelleydrye.com
dkane@kelleydrye.com

and

Robert J. Feinstein, Esq.
Bradford J. Sandler, Esq.
Cia H. Mackle, Esq.
PACHULSKI STANG ZIEHL & JONES LLP
1700 Broadway, 36th Floor
New York, NY 10019
Telephone: (212) 561-7700
Facsimile: (212) 561-7777
rfeinstein@pszjlaw.com
bsandler@pszjlaw.com
cmackle@pszjlaw.com

Counsel to the GUC Trustee